



Frederick E. Moacidieh
Executive Director
Federal Regulatory and Legal Affairs

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June 1, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Section 63.71 Application of Verizon Maryland LLC, Verizon New England Inc.,
Verizon New Jersey Inc., Verizon New York, Inc., Verizon Pennsylvania LLC, and
Verizon Virginia LLC**

Dear Ms. Dortch:

The Verizon incumbent local exchange companies captioned above submit the enclosed Application for authority under Section 214(a) of the Communications Act and 47 C.F.R. § 63.71 to discontinue five legacy interstate DS0 services in multiple wire centers.¹

Sincerely,

A handwritten signature in black ink, appearing to be "F. Moacidieh", written in a cursive style.

Enclosure

cc: Department of Defense Chief Information Officer
Governor of Each Impacted State
Public Utilities Commission of Each Impacted State

¹ These legacy voice and low-speed data services are Voice Grade Service, WATS Access Line Service, Bonded Digital Link Service, Digital Data Service, and DIGIPATH Digital Service II. A list of affected wire centers is included in the Application at Exhibit A.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Section 63.71 Application of Verizon)	
Maryland LLC, Verizon New England)	
Inc., Verizon New Jersey Inc., Verizon)	
New York Inc., Verizon Pennsylvania)	
LLC, and Verizon Virginia LLC)	File No. _____
)	
For Authority Pursuant to Section 214 of)	
the Communications Act of 1934, As)	
Amended To Discontinue the Provision of)	
Service)	

**SECTION 63.71 APPLICATION OF CERTAIN
VERIZON INCUMBENT LOCAL EXCHANGE COMPANIES**

The Verizon incumbent local exchange companies captioned above (collectively “Verizon”) submit this Application for authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission’s rules to discontinue five legacy interstate DS0 services in multiple wire centers.¹ These services were grandfathered on November 22, 2016, with no objections.² Since then, existing customers have been permitted to continue to submit orders for moves, adds, and changes, but no new customers have been added. Today, there are relatively few customers still using these products, as customers continue to migrate away from these older services toward more modern and appropriate options. Given the low numbers of subscribers and high costs of supporting these services, we plan to work to transition the remaining customers to other services as well. We plan to stop permitting or accepting orders

¹ These legacy voice grade and low-speed data services are Voice Grade Service, WATS Access Line Service, Bonded Digital Link Service, Digital Data Service, and DIGIPATH Digital Service II. A list of the affected wire centers is included at Exhibit A.

² See September 23, 2016 Public Notice, WC Docket No. 16-296 (DA 16-1085).

for moves, adds, or changes on or after September 15, 2017; we plan to discontinue the services completely on or after December 31, 2017.³

As noted previously, customers in these areas are being migrated to all-fiber facilities in a multi-stage process. Many customers have already made the decision to move either to our fiber-based services or to competitors' services; others are in the process of transitioning. During this transition, we have been working closely with our customers receiving service over copper facilities to discuss their existing services and their needs going forward. For the vast majority, there has been a like-for-like, fiber-based service available for them, making this transition straightforward. This is the case for customers purchasing plain old telephone service (POTS) from us. These POTS customers will continue to receive the same POTS over fiber at the same or better price, and there is no change in the underlying features and functionalities in their service. For those customers purchasing broadband Internet services over copper facilities, Fios Internet will provide them far more than they are getting today. Notwithstanding the greater speed and reliability they will experience, our offerings for these customers will also include comparable pricing. Similarly, customers can continue to buy DS1 level services as they do today, just over the more reliable fiber network.⁴

However, as we noted previously, there are a small number of legacy interstate special access services—Voice Grade Service, WATS Access Line Service, Bonded Digital Link Service, Digital Data Service, and DIGIPATH Digital Service II—which no longer serve a substantial need for the majority of our customers. These services are outdated legacy voice grade and data transmission services that have largely fallen out of favor as customers have chosen new options and technologies. Given the decreased demand for these outdated offerings,

³ Modifications in service offerings for customers with existing contracts are subject to the terms of their contract or of the tariff.

⁴ Higher bandwidth services are today already regularly provisioned over fiber facilities and customers will continue to be able to buy them.

we previously sought and received authority effective November 22, 2016,⁵ to grandfather those services, preventing new customers from ordering them but allowing existing customers to continue to submit orders for moves, adds, and changes. As customers have continued to transition away from these legacy services, today we have no customers on Bonded Digital Link; only two customers on WATS; and about 160 in total on DDS, DIGIPATH, and Voice Grade in these areas. Because of this decline, and given the high costs to keep these services up and running for just a handful of customers, we plan to stop permitting or accepting orders for moves, adds, or changes on or after September 15, 2017, and to discontinue the services on or after December 31, 2017.

Consistent with Section 63.71(a) and (b) of the Commission's rules, Verizon provides the following information:

1. Name and Address of Carrier (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):

Verizon Maryland LLC
1 East Pratt Street
Baltimore, MD 21202

Verizon New England Inc.
125 High Street - Oliver Tower 7th Floor
Boston, MA 02110

Verizon New Jersey Inc.
One Verizon Way
Basking Ridge, NJ 07920

Verizon New York Inc.
140 West Street
New York, NY 10007

Verizon Pennsylvania LLC
1717 Arch Street
Philadelphia, PA 19103

Verizon Virginia LLC
22001 Loudoun County Parkway
Ashburn, VA 20147

⁵ See September 23, 2016 Public Notice, WC Docket No. 16-296 (DA 16-1085).

2. Date of Planned Service Discontinuation (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

Subject to the Commission's authorization, on or after September 15, 2017, Verizon will not permit or accept orders for moves, adds, or changes to existing Voice Grade Service, WATS Access Line Service, Bonded Digital Link Service, Digital Data Service, and DIGIPATH Digital Service II in the affected wire centers.⁶ Verizon intends to discontinue offering these services on or after December 31, 2017.

3. Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

Subject to the Commission's authorization, Verizon intends to discontinue the aforementioned services in the wire centers listed in Exhibit A.

4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):

The services at issue here are all legacy voice grade and very low-speed data transmission services. Specifically, the five services here are:

Voice Grade Service uses dedicated lines to provide voice frequency transmission capability for connecting location-to-location or to the public network. Voice Grade Service terminations transmit in the nominal frequency range of 300 to 3000 Hz. It may be terminated as analog two-wire or four-wire. Voice Grade channels are provided between customer-designated premises or between a customer-designated premise and a Verizon hub. Voice Grade Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.3 and Verizon's FCC Tariff No. 11, Sec. 7.2.3.

WATS Access Line Service provides voice frequency transmission capability for toll free calling in a limited geographic area. The service provides a customer-premise-to-customer-premise connection with the combination of WATS Access Connection, a dedicated channel

⁶ Please see Exhibit A for a list of the affected wire centers. Subject to the Commission's authorization, on or after September 15, 2017, Verizon intends to file tariff revisions on 15 days' notice to prohibit moves, adds, or changes to these services. Subject to the Commission's authorization, on or after December 31, 2017, Verizon intends to file tariff revisions on 15 days' notice to effect the discontinuance of these services.

between the customer's end user's premises and a WATS Serving Office equipped with a Switched Access Service arrangement. WATS Access Line Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.3.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.10.

Bonded Digital Link Service provides connecting channels for the transmission of voice or data between an end user's local exchange service terminating at a digital cross connect facility and special access service provided by Verizon within the same wire center or at another wire center within the same LATA. Bonded Digital Link Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.21. Verizon has no customers on Bonded Digital Link Service in the wire centers listed in Exhibit A.

Digital Data Service provides duplex transmission of synchronous serial data at 2.4, 4.8, 9.6, or 56 Kbps. In addition, Digital Data Service is offered at 19.2 or 64 Kbps in the wire centers in Verizon's FCC Tariff No. 1 that are identified in Exhibit A. The actual bit rate is a function of the channel interface selected by the customer. Digital Data Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8 and Verizon's FCC Tariff No. 11, Sec. 7.2.8.

DIGIPATH Digital Service II is a channel for the simultaneous transmission of digital data at the rate of 2.4, 4.8, 9.6, 19.2, 56, or 64 Kbps. The actual bit rate is a function of the channel interface selected by the customer. DIGIPATH Digital Service II is further described in Verizon's FCC Tariff No. 11, Sec. 7.2.11.

Alternative Services and Products: Customers today can obtain alternative services and products from Verizon or other providers that perform the same functions as these services. Verizon's alternative wholesale products and services include Wholesale Advantage or Resale, Fiber to the Internet Service, Transparent LAN Service (TLS), Private Internet Protocol Service, and DS1 Service. Verizon's alternative retail products and services include fiber-based Voice Service, Fios Internet, Switched Ethernet Service, Private Internet Protocol Service, DS1

Service, and Machine-to-Machine Service. Verizon will work with affected customers to find suitable alternative solutions.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):

Verizon sent notices to customers that currently subscribe to the affected services by U.S. Mail on or before June 1, 2017. Copies of the notices are attached as Exhibit B.

Verizon is sending copies of this Application by first class U.S. Mail to the governor and public utilities commission for each affected state as well as to the Department of Defense Chief Information Officer, as required by Section 63.71(a) of the Commission's rules.

6. Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

Verizon is classified for regulatory purposes under the Commission's rules as dominant with respect to the services to be discontinued.

CONCLUSION

Verizon respectfully requests that the Commission approve this Application.

Respectfully submitted,



William H. Johnson
Of Counsel

Katharine R. Saunders
Roy E. Litland
Verizon
1300 I St NW Ste 500E
Washington, DC 20005-7101
(202) 515-2464 (Office)

June 1, 2017

CERTIFICATE OF SERVICE

I hereby certify that on this first day of June, 2017, I caused to be served a copy of the foregoing Section 63.71 Application by U.S. Mail postage prepaid to the following parties on the attached service list.

A handwritten signature in black ink that reads "Roy Litland". The signature is written in a cursive, slightly slanted style.

Roy E. Litland

SERVICE LIST

David Collins
Executive Secretary
Public Service Commission of Maryland
6 St. Paul Street, 16th Floor
William Donald Schaeffer Tower
Baltimore, MD 21202-6806

Secretary's Bureau
Pennsylvania Public Utility Commission
400 North Street,
2nd Floor, Room N201
Harrisburg, PA 17120

Irene Kim Asbury
Secretary
New Jersey Board of Public Utilities
44 S. Clinton Avenue
3rd Floor, Suite 314
Trenton, NJ 08625-0350

Honorable Kathleen H. Burgess
Secretary to the Commission
New York Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Karen Charles Peterson
Commissioner
Massachusetts Department of
Telecommunications and Cable
1000 Washington Street
Suite 820
Boston, MA 02118

Margaret E. Curran
Chairperson
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Office of the Clerk - SCC
Joel H. Peck
Virginia State Corporation Commission
P.O. Box 2118
Richmond, VA 23218

Department of Defense Chief Information
Officer
Attn: Military Asst/Mobility Team
The Pentagon
Washington, DC 20301

The Honorable Larry Hogan
Office of the Governor
State House
100 State Circle
Annapolis, MD 21401-1925

The Honorable Tom Wolf
Office of the Governor
508 Main Capitol Building
Harrisburg, PA 17120

The Honorable Chris Christie
Office of the Governor
P.O. Box 001
Trenton, NJ 08625

The Honorable Andrew M. Cuomo
Governor of New York
NYS State Capitol Building
Albany, NY 12224

The Honorable Charlie Baker
Office of the Governor
Room 280
Boston, MA 02133

The Honorable Gina Raimondo
Office of the Governor
82 Smith Street
Providence, RI 02903

The Honorable Terry McAuliffe
Office of the Governor
P.O. Box 1475
Richmond, VA 23218

EXHIBIT A

STATE	Wire Center	Verizon Tariff
MA	ASHLAND	FCC 11
MA	DANVERS	FCC 11
MA	DUXBURY	FCC 11
MA	FRAMINGHAM	FCC 11
MA	HOLLISTON	FCC 11
MA	HOPKINTON	FCC 11
MA	LAWRENCE	FCC 11
MA	MARSHFIELD	FCC 11
MA	MEDWAY	FCC 11
MA	MILLIS	FCC 11
MA	NEWTON	FCC 11
MA	TOPSFIELD	FCC 11
MA	WAYLAND	FCC 11
MD	BETHESDA	FCC 1
NJ	BERGEN	FCC 1
NJ	BLOOMFIELD	FCC 1
NJ	COLLINGSWOOD	FCC 1
NJ	CRANFORD	FCC 1
NJ	HACKENSACK	FCC 1
NJ	HADDONFIELD	FCC 1
NJ	JOURNAL SQUARE	FCC 1
NJ	MORRISTOWN	FCC 1
NJ	NEW BRUNSWICK	FCC 1
NY	FREEPORT	FCC 11
NY	HEMPSTEAD	FCC 11
NY	LONG BEACH	FCC 11
NY	NEW DORP	FCC 11
NY	WEST 42ND STREET	FCC 11
NY	WHITE PLAINS	FCC 11
PA	JENKINTOWN	FCC 1
PA	KIRKLYN	FCC 1
PA	MAYFAIR	FCC 1
PA	MECHANICSBURG	FCC 1
PA	PILGRIM	FCC 1
PA	TULLYTOWN	FCC 1
RI	WASHINGTON ST	FCC 11
VA	COLUMBIA PIKE	FCC 1
VA	FALLS CHURCH	FCC 1
VA	SPRINGFIELD	FCC 1

EXHIBIT B



Verizon

One Verizon Way, VC22W464
Basking Ridge, NJ 07920

June 1, 2017

Business Name
Billing address 1
Billing Address 2
Billing Address 3
City, State Zip

RE: FCC Service Discontinuance

Dear Valued Customer,
Account Number:

In December 2016, Verizon stopped offering certain Interstate Special Access services to *new* subscribers in wire centers undergoing a copper-to-fiber optic plant upgrade. Verizon "grandfathered" these special access services for *existing* subscribers; permitting them to retain their current service, and to conduct circuit moves, additions and changes until further notice. These actions were taken in order to limit the number of circuits provisioned on our copper plant while we rolled out a more advanced fiber-optic network.

As Verizon completes this copper-to-fiber transition program, we plan to discontinue these services if they originate or terminate in one of the 39 wire centers listed on **Attachment 1**.

According to our records, you currently subscribe to one of the services that we intend to discontinue in these offices. Those services are:

Voice Grade Service which provides voice frequency transmission capability in the nominal frequency range of 300 to 3000 Hz. Voice Grade Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.3 and Verizon's FCC Tariff No. 11, Sec. 7.2.3.

WATS Access Line Service which provides voice frequency transmission capability for toll-free calling in a limited geographic area. WATS Access Line Service is further described in Verizon's FCC Tariff No.1, Sec. 7.2.3.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.10.

Bonded Digital Link Service which provides connecting channels for the transmission of voice or data between an end user's local exchange service and special access service provided by the Verizon local telephone company. Bonded Digital Link Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.21.

Digital Data Service which provides duplex transmission of synchronous serial data at the rate of 2.4, 4.8, 9.6, 56 kbps. In addition, Digital Data Service is offered at speeds of 19.2 and 64 kbps in the wire centers subject to Verizon's FCC No. 1 (see Attachment 1). Digital Data Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8 and Verizon's FCC Tariff No.11, Sec. 7.2.8.

DIGIPATH Digital Service II which provides a channel for the simultaneous transmission of digital data at the rate of 2.4, 4.8, 9.6, 19.2, 56 or 64 kbps. DIGIPATH Digital Service II is further described in Verizon's FCC Tariff No.11, Sec 7.2.11.

This letter is being sent to inform you of our plans for service discontinuation and urge you to begin making arrangements to migrate applications that use these services to an alternative service or carrier and avoid service disruption.

On or after **September 15, 2017**, subject to approval from the FCC, Verizon will stop accepting orders for these services. No circuit moves, circuit adds, or changes to existing service will be allowed after this date. In addition, no service term-commitments will be renewed or extended.

Service disconnections may begin on or after **December 31, 2017**, again subject to FCC approval.

Modifications in service offerings for customers with existing contracts are subject to the terms of their contract or of the tariff.

The timing for when Verizon will disconnect your service(s) will depend on our schedule for completing the fiber-optic transition in your area. Verizon will provide you 90 days advance notice of the actual date for your service disconnection. We urge you to arrange for an alternative service to meet your needs before the disconnection date.

Please use this interim period to review the application(s) for which you are currently using the aforementioned services and determine what alternative service or carrier you may wish to migrate these applications to, prior to the disconnect of your current service. We are happy to work with you to find alternative solutions. Verizon offers several alternatives to these services that may suit your needs, including:

- *Fiber-based voice service*
- *Fios Internet Service*
- *Switched Ethernet Service*
- *Private Internet Protocol Service*
- *DS1 Service*
- *Machine-to-Machine Services*

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you. Please contact your Verizon Account Manager to discuss alternative solutions.

Sincerely,
Verizon

On behalf of:

Verizon Maryland LLC
1 East Pratt Street
Baltimore, MD 21202

Verizon New England Inc.
125 High Street
Oliver Tower 7th Floor
Boston, MA 02110

Verizon New Jersey Inc.
One Verizon Way
Basking Ridge, NJ 07920

Verizon New York Inc.
140 West Street
New York, NY 10007

Verizon Pennsylvania LLC
1717 Arch Street
Philadelphia, PA 19103

Verizon Virginia LLC
22001 Loudoun County Parkway
Ashburn, VA 20147

FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 30 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Verizon Maryland LLC; Verizon New England Inc.; Verizon New York Inc.; Verizon New Jersey Inc.; Verizon Pennsylvania LLC; and Verizon Virginia LLC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

ATTACHMENT 1	
State	WireCenter
MA	ASHLAND
MA	DANVERS
MA	DUXBURY
MA	FRAMINGHAM
MA	HOLLISTON
MA	HOPKINTON
MA	LAWRENCE
MA	MEDWAY
MA	MILLIS
MA	MARSHFIELD
MA	NEWTON
MA	TOPSFIELD
MA	WAYLAND
MD	BETHESDA
NJ	BLOOMFIELD
NJ	COLLINGSWOOD
NJ	CRANFORD
NJ	HACKENSACK
NJ	HADDONFIELD
NJ	BERGEN
NJ	JOURNAL SQUARE
NJ	MORRISTOWN
NJ	NEW BRUNSWICK
NY	FREEPORT
NY	HEMPSTEAD
NY	LONG BEACH
NY	WEST 42ND STREET
NY	NEW DORP
NY	WHITE PLAINS
PA	JENKINTOWN
PA	KIRKLYN
PA	MECHANICSBURG
PA	MAYFAIR
PA	PILGRIM
PA	TULLYTOWN
RI	WASHINGTON ST
VA	COLUMBIA PIKE
VA	FALLS CHURCH
VA	SPRINGFIELD



Verizon

One Verizon Way, VC22W464
Basking Ridge, NJ 07920

June 1, 2017

Business Name
Billing address 1
Billing Address 2
Billing Address 3
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RE: FCC Service Discontinuance

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Service disconnections may begin on or after **December 31, 2017**, again subject to FCC approval.

Modifications in service offerings for customers with existing contracts are subject to the terms of their contract or of the tariff.

The timing for when Verizon will disconnect *your* service(s) will depend on our schedule for completing the fiber-optic transition in your area. Verizon will provide you 90 days advance notice of the actual date for your service disconnection. We urge you to arrange for an alternative service to meet your needs before the disconnection date.

Please use this interim period to review the application(s) for which you are currently using the aforementioned services and determine what alternative service or carrier you may wish to migrate these applications to, prior to the disconnect of your current service. We are happy to work with you to find alternative solutions. Verizon offers several alternatives to these services that may suit your needs, including:

- *Wholesale Advantage or Resale*
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- *DS1 Service*
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ATTACHMENT 1	
State	WireCenter
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MA	FRAMINGHAM
MA	HOLLISTON
MA	HOPKINTON
MA	LAWRENCE
MA	MEDWAY
MA	MILLIS
MA	MARSHFIELD
MA	NEWTON
MA	TOPSFIELD
MA	WAYLAND
MD	BETHESDA
NJ	BLOOMFIELD
NJ	COLLINGSWOOD
NJ	CRANFORD
NJ	HACKENSACK
NJ	HADDONFIELD
NJ	BERGEN
NJ	JOURNAL SQUARE
NJ	MORRISTOWN
NJ	NEW BRUNSWICK
NY	FREEPORT
NY	HEMPSTEAD
NY	LONG BEACH
NY	WEST 42ND STREET
NY	NEW DORP
NY	WHITE PLAINS
PA	JENKINTOWN
PA	KIRKLYN
PA	MECHANICSBURG
PA	MAYFAIR
PA	PILGRIM
PA	TULLYTOWN
RI	WASHINGTON ST
VA	COLUMBIA PIKE
VA	FALLS CHURCH
VA	SPRINGFIELD